

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

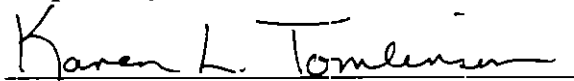
SPECIAL SERVICES FEES AND
CLASSIFICATIONS

DOCKET NO. MC96-3

FOLLOWUP INTERROGATORIES OF
UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE
(UPS/USPS-1 through 3)
(September 3, 1996)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice and
Section 2(E) of the Commission's Special Rules of Practice, Ruling No. MC96-3/3, United
Parcel Service hereby submits the attached followup interrogatories UPS/USPS-1 through 3 to
the United States Postal Service.

Respectfully submitted,



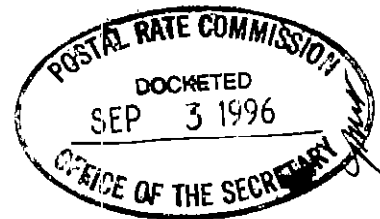
John E. McKeever

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Of Counsel.



UPS/USPS-1. Please refer to your response to OCA/USPS-29 and explain which CAG/finance numbers are grouped together for purposes of this process. That is, does each CAG form its own pool for purposes of calculating average dollar weight?

UPS/USPS-2. Please refer to your response to OCA/USPS-26 and confirm that no offices have moved from CAG A to a lower-ranked CAG (B-J) from 1993 to 1995. If you cannot confirm, please explain in full.

UPS/USPS-3. Please refer to your response to OCA/USPS-26 and to the table below.

(a) Please confirm that costs associated with CAG A offices have significantly decreased from 1993 to 1995. If confirmed, please explain what caused this decrease. If you cannot confirm, please explain in full.

(b) Please confirm that costs associated with CAG B offices have significantly increased from 1993 to 1995. If confirmed, please explain what caused this increase. If you cannot confirm, please explain in full.

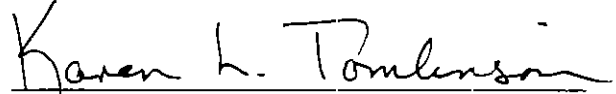
(c) Please explain the changes from 1993 to 1995 in the costs associated with CAGs C-J.

**Cost Segment 3.1 Clerks and Mailhandlers (F9252=2,3, or 4)
IOCS F9250 (Tally Dollars)**

CAG	1995 IOCS			1993 IOCS		
	Sum	Count	\$/Obs	Sum	Count	\$/Obs
A	\$ 3,754,784	73,612	\$ 51	\$ 4,631,370	67,816	\$ 68
B	\$ 5,386,825	98,831	\$ 55	\$ 2,909,573	90,528	\$ 32
C	\$ 894,901	11,874	\$ 75	\$ 1,544,478	31,901	\$ 48
D	\$ 423,140	3,889	\$109	\$ 566,944	4,471	\$127
E	\$ 428,962	3,221	\$133	\$ 568,045	2,927	\$194
F	\$ 256,971	1,878	\$137	\$ 318,161	1,698	\$187
G	\$ 159,557	641	\$249	\$ 228,418	706	\$324
H	\$ 100,904	369	\$273	\$ 131,465	345	\$381
J	\$ 42,168	138	\$306	\$ 45,320	140	\$324
Sum	\$ 11,448,212	194,453	\$ 59	\$10,943,774	200,532	\$ 55

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice and the Special Rules of Practice in this proceeding.

A handwritten signature in cursive script that reads "Karen L. Tomlinson". The signature is written in dark ink and is positioned above a horizontal line.

Karen L. Tomlinson
Attorney for United Parcel Service

Dated: September 3, 1996
Philadelphia, Pa.